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#### **REMARKS/ARGUMENTS**

Claims 1-45 are pending in this application, and claims 2-9 and 25-44 have been withdrawn from consideration. By this amendment, claims 1, 10, 14, 18, 23, and 24 have been amended and new claims 46-48 have been added. Furthermore, withdrawn claims 2, 5-8, 27, 29, and 31-33 are currently amended. It is submitted that no new matter has been introduced by these amendments. Reconsideration and reexamination of the application is respectfully requested.

Claims 1, 10, 12-14, 20, and 45 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Japanese Patent Application Publication No. 9-10492 to Sanka (Sanka). The rejection is respectfully traversed.

For Sanka to anticipate these claims, each and every limitation in the claims must be found in Sanka. Since such is not the case, the anticipation rejection must fail.

Sanka discloses a cabinet having a lower section B for storing a washing machine 40 and an upper section A for storing a clothes dryer 30. Each section A, B can be opened and closed separately with the use of doors. Additionally, the upper section A is the drying room of the clothes dryer 30. Items to be dried are placed in the upper section A, and the clothes dryer 30 circulates air through the upper section A to dry the clothes.

As amended, claim 1 requires an integrated laundry center to comprise a cabinet assembly having plurality of interconnecting panels that define discrete spaces. A washer discrete space is sized to hold a washing machine, and a clothes dryer discrete space is sized to hold a clothes dryer. The interconnecting panels further define a supplemental drying discrete space, and the laundry center further includes an air moving device arranged to deliver air to the supplemental drying discrete space. Claim 1 specifically includes structural elements, the interconnecting panels, that define and separate the discrete spaces from one another. Sanka does not disclose a cabinet having a plurality of interconnecting panels that define a washer discrete space sized to house a washing machine, a clothes dryer discrete space sized to house a clothes dryer, and a separate supplemental drying discrete space and an air moving device to supply air to the supplemental drying discrete space; therefore Sanka does not anticipate claim 1, and claim 1 is allowable over Sanka.

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Applicants note that the limitations of the decorative fascia panels and the air inlet and outlet originally included in claim 1 have been deleted and submitted as new claims 47 and 48.

Claims 10, 12-14, 20, and 45 all depend directly or indirectly from claim 1 and are allowable over Sanka for at least the same reasons that claim 1 is allowable over Sanka.

Claim 10 further defines over the prior art by incorporating a slidable shelf that is slidable into and out of the cabinet assembly. Sanka discloses a partition that is slidable, but the partition remains inside the cabinet regardless of its sliding position. It functions to separate the upper and lower sections and can be retracted to provide access to the top of the washing machine in the lower section. Thus, the Sanka partition cannot slide out of the cabinet assembly and be used to support items outside the cabinet assembly. Because Sanka does not disclose a slidable shelf as described in claim 10, claim 10 is also independently allowable over Sanka.

Claim 20 depends indirectly from claim 1 through claim 12, which adds a clothes supporting device, and describes the clothes supporting device as comprising at least one horizontal surface having a plurality of perforations permitting air to pass through the horizontal surface. Sanka does not teach or suggest utilizing a perforated horizontal surface to support clothes. The Examiner claims that the partition shown in Fig. 7 of Sanka is perforated; however, one cannot deduce from this figure that the partition is perforated. Rather, the partition is illustrated with horizontal lines on the top surface of the partition; these lines can represent numerous things, such as a textured top surface or partition segments that collapse or fold onto one another when the partition is opened. The text does not appear to address these lines or describe what they represent in any manner. Because Sanka does not disclose a perforated horizontal surface, as required by claim 20, claim 20 is also independently allowable over Sanka.

Claim 45 further defines over the prior art by defining the integrated cabinet structure as comprising an integrated frame structure having a plurality of interconnected frame elements. Sanka does not appear to disclose an integrated frame structure for its cabinet. It therefore follows that claim 45 is also independently allowable over Sanka.

Claims 11, 15-16, and 21-24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Sanka in view of U.S. Patent No. 502,237 to Proctor (Proctor). The rejection is respectfully traversed.

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Proctor discloses a drying machine in which the material to be dried is supported in a drying compartment B and is subjected to heat furnished by a heating coil G in an air heating compartment C and circulated through the drying compartment by air moving fans D. The drying machine includes slides or drawers F that are capable of being fully or partially withdrawn from the machine while the material is placed in them and being returned within the machine during the drying process.

Applicants assert that the attempted combination of Sanka and Proctor must fail as there is no teaching, suggestion, or motivation to combine the references. The Examiner suggests modifying the cabinet of Sanka with the slidable drawers of Proctor. However, Sanka specifically teaches hanging clothes in the upper section by a hanger and does not mention using any other type of clothes support, including a shelf, slide, or drawer that is slidable into and out of the cabinet assembly, in the upper section. Furthermore, Proctor teaches a drying machine that is a stand alone unit with a single heating system for a single air heating compartment that holds a plurality of slides and does not suggest utilizing the drying machine in a cabinet of an integrated laundry center.

Assuming, *arguendo*, that the combination of Sanka and Proctor is tenable, the combination still does not reach the claimed invention. The alleged combination would essentially result in the Sanka cabinet with the upper section, including the clothes dryer, replaced with the Proctor drying machine, which is, at best, a dryer *or* a supplemental dryer but not an entire system with a dryer *and* a supplemental dryer. As discussed above, claim 1 recites a cabinet having a plurality of interconnecting panels that define a washer discrete space sized to house a washing machine, a clothes dryer discrete space sized to house a clothes dryer, and a separate supplemental drying discrete space and an air moving device to supply air to the supplemental drying discrete space. The alleged combination does not include these features. In particular, the alleged combination does not have a plurality of interconnecting panels that define a washing machine discrete space, a clothes dryer discrete space, *and* a supplemental drying discrete space. Furthermore, the differences between the alleged combination and the integrated laundry center of claim 1 are not obvious in view of the alleged combination. Therefore, claim 1 is patentable over the alleged combination. Claims 11, 15-16, and 21-24 all depend indirectly from

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claim 1 and are patentable over the alleged combination for at least the same reasons that claim 1 is patentable over the alleged combination.

Claim 11, which depends from claim 10, further defines over the alleged combination and calls for at least two of the slidable shelves, wherein one is usable as a clothes folding shelf and the other is usable as a retractable support surface. The slides of Proctor, which are incorporated in the alleged combination, are formed by a frame consisting of side pieces I, back pieces J, and a pair of cross braces K and do not provide a shelf, much less a shelf that can be used as a folding shelf as the clothes would fall between the cross braces or between the back piece and one of the cross braces. Further, it would not be obvious to one of ordinary skill in the art to incorporate such a shelf into the alleged combination. It therefore follows that claim 11 is independently patentable over the alleged combination.

Claim 21 depends from claim 20, and, as discussed above, claim 20 describes the clothes supporting device as comprising at least one horizontal surface having a plurality of perforations permitting air to pass through the horizontal surface. Claim 21 specifies that the supplemental drying discrete space comprises a horizontal drying discrete space including a plurality of the perforated horizontal surfaces stacked on top of and spaced from one another. The alleged combination does not include a clothes supporting device comprising a perforated horizontal surface. Similar to the argument presented above, the slides of Proctor are formed by a frame and do not include a horizontal surface that can support clothes, much less a perforated horizontal surface, as required by claim 20, or a plurality of stacked and spaced perforated horizontal surfaces, as required by claim 21. Additionally, it would not be obvious to one of ordinary skill in the art to incorporate these features into the alleged combination. Thus, claims 20 and 21 are each independently patentable over the alleged combination.

Claims 22 and 23 depend from claim 21 and specify that the clothes supporting device is at least one drawer (claim 22) or a plurality of the drawers (claim 23) with a bottom surface formed by the perforated horizontal surface. For the same reasons presented above with respect to claims 20 and 21, claims 22 and 23 are independently patentable over the alleged combination.

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Claim 24 further defines over the alleged combination by adding a decorative exterior front fascia panel that covers a front surface of the drawer. The slides of Proctor do not have a front panel that covers a front surface of the slide and, therefore, do not have a decorative front fascia panel. Further, it would not be obvious to one of ordinary skill in the art to incorporate a decorative front fascia panel into the alleged combination. Thus, claim 24 is also independently patentable over the alleged combination.

Claims 17-19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Sanka in view of U.S. Patent No. 5,720,108 to Rice (Rice). The rejection is respectfully traversed.

Rice discloses a drying device that can be used for drying or warming the insides of boots, gloves, mittens, and other clothing articles used for protecting extremities of a person's body in snow or inclement weather. The drying device includes a heater/air blower assembly 16 for producing a blowing stream of hot air A and a duct assembly 18. The duct assembly 18 includes a manifold 19 for splitting the air stream from the air blower assembly 16 into two streams. A pair of hoses or duct tubes 20, 22 conduct the two air streams A from the manifold 19 to the interiors of a pair of boots, gloves, or other clothing articles to be dried, and optional nozzles 24, 26 direct the air stream A in the boots 12 or gloves 14. The air stream A discharged through hose nozzles 24, 26 circulates within the interior of the boots 12 or gloves 14 before exiting, thus warming and drying the inside 28 of the boots 12 or gloves 14.

Applicants traverse the combination of Sanka and Rice. As there is no teaching, suggestion, or motivation to combine the references, the attempted combination of Sanka and Rice must fail.

The Examiner suggests combining the cabinet of Sanka with the portable boot dryer of Rice. However, there is no teaching, suggestion, or motivation in Sanka or Rice to warrant the combination. Sanka makes no reference to including a device specifically designed to dry and support shoes in the upper section of the cabinet. Further, Rice specifically describes an independently operable and portable boot and glove dryer and does not discuss utilizing the dryer in combination with any other device, much less in a cabinet of an integrated laundry center. Further, the Examiner has made no showing as to why it would be obvious to one of ordinary skill in the art to incorporate the portable boot dryer of Rice in the cabinet of Sanka, especially

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considering that a primary feature of the Rice boot dryer is that it is portable and can be used independently of other devices. It is therefore submitted that the alleged combination of Sanka in view of Rice is inappropriate and cannot tenably be made.

Assuming, *arguendo*, that the combination of Sanka and Rice is tenable, the combination still does not reach the claimed invention. As discussed above, claim 1 recites a cabinet having a plurality of interconnecting panels that define a washer discrete space sized to house a washing machine, a clothes dryer discrete space sized to house a clothes dryer and a separate supplemental drying discrete space and an air moving device to supply air to the supplemental drying discrete space. The alleged combination does not include a plurality of interconnecting panels that define a washing machine discrete space, a clothes dryer discrete space, *and* a supplemental drying discrete space, as required by claim 1, and these differences are not obvious in view of the alleged combination. Therefore, claim 1 patentable over the alleged combination. Claims 17-19 all depend indirectly from claim 1 and are patentable over the alleged combination for at least the same reasons that claim 1 is patentable over the alleged combination.

It is respectfully submitted that the claims are allowable over the prior art of record. Nevertheless, Applicants are filing a Request for Continued Examination contemporaneously herewith pursuant to 37 C.F.R. § 1.114. Prompt notification of allowability is respectfully requested.

Respectfully submitted,  
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